

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

DECLARATION OF ROBERT J. TOLCHIN

Robert J. Tolchin declares pursuant to 28 U.S.C. § 1746, as follows:

1. I am an attorney licensed to practice law in the State of New York and in this Court, and counsel for the Plaintiffs in the above-referenced action. I am providing this Declaration in support of plaintiffs' *Ex Parte* Motion to the Magistrate Judge to Issue a Letter of Request for Judicial Assistance.

2. Plaintiff Dr. Alan Bauer and his minor son plaintiff Y.B. were severely injured on March 21, 2002 in a suicide bombing in downtown Jerusalem, Israel. The suicide bomber was one Mohammed Hashaika, who was employed as a policeman by defendant Palestinian Authority. An Israeli court subsequently convicted Ms. Sana'a Shehadeh of participating in the March 21, 2002, attack, and sentenced her to life imprisonment.

3. Plaintiffs' counsel were informed by the Israeli Prison Service ("IPS") that Ms. Shehadeh holds an identification number issued by the Israeli Ministry of the Interior (no. 081021198), and that she is either a citizen or a permanent legal resident of the State of Israel.

4. In October 2011, Ms. Shehadeh was released from prison by Israeli authorities as part of a prisoner exchange. An official list of released prisoners that is published by the IPS on its website (<http://shabas.gov.il/listengl.xls>) confirms that Ms. Shehadeh's home is in Israel, and that she was released into Israel. *See* Exhibit 1 at last page, listing for prisoner no. 468.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

February 23, 2012



Robert J. Tolchin